

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

In Re:	§	
	§	CASE NUMBER: 17-31646
	§	
MONTCO OFFSHORE, INC., et al ¹	§	CHAPTER 11
	§	
Debtors	§	(JOINTLY ADMINISTERED)
	§	

NOTICE OF APPEARANCE AND REQUEST FOR
NOTICES AND PLEADINGS

The undersigned hereby enters his appearance on behalf of Odyssea Marine, Inc. (“Odyssea” or “creditor”), a creditor and interested party, and pursuant to Bankruptcy Rules 2002, 3017 and 9007, requests that all notices, pleadings, motions, schedules and papers filed in this matter be sent to:

Robin B. Cheatham
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New Orleans, LA 70139
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The filing of this Notice of Appearance should not be construed as, or interpreted as, a waiver of any and all defenses, jurisdictional or otherwise, that may exist in favor of creditor, nor should the filing of such notice of appearance be deemed to be (i) a consent to the equity jurisdiction of this Court, (ii) an acknowledgment that any specific adversary proceeding or

¹ The Debtors in these chapter 11 cases together with the last four (4) digits of each Debtor’s federal tax identification number, are Montco Offshore, Inc. (1448) and Montco Oilfield Contractors, LLC (9886). The mailing address for the Debtors, solely for the purposes of notices and communications, is 17751 Hwy 3235, Galliano, Louisiana 70354.

contested matter is either core or non-core; (iii) an acknowledgment or consent to the entry by this Court of a final judgment in any adversary proceeding or contested matter; or (iv) a waiver of any right to jury trial which may exist in favor of creditor, in any proceeding that has been or will be instituted during the course of the case, (v) a waiver of creditor's rights to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (vi) a waiver of creditor's rights to have final orders in non-core matters entered only after *de novo* review by a United States District Court. Creditor specifically reserves all rights, remedies, claims, actions, setoffs, or recoupments to which creditor is or may be entitled, in law or in equity, all of which rights, remedies, claims, actions, setoffs, and recoupments creditor expressly reserves.

Respectfully Submitted,

/s/ Robin B. Cheatham

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Attorneys for Odyssey Marine, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Notice of Appearance and Request for Notice has been served upon all parties listed below via the court's CM/ECF electronic filing system and/or by placing a copy in the United States mail, postage prepaid and properly addressed on this 20th days of March, 2017

- Carl Dore carl@dorelawgroup.net, bbollman@dorelawgroup.net
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Montco Oilfield Contractors, LLC
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/s/ Robin B. Cheatham

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